

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1

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In Re:

CHERRY STREET CAPITAL 113-27, LLC
Debtor.

Case No. 22-14577-JKS

Chapter 11

Hon. John K. Sherwood

SECURED CREDITOR, IPFS CORPORATION'S
NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. §362(d) & RELATED RELIEF

PLEASE TAKE NOTICE that secured creditor, IPFS Corporation ("IPFS"), by and through its undersigned counsel, shall move before the Honorable John K. Sherwood, U.S.B.J. on August 30, 2022 at 10:00 a.m., or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, District of New Jersey, 50 Walnut St # 3017, Newark, NJ 07102, for entry of an Order granting IPFS relief from the automatic stay and related relief (the "Motion").

PLEASE TAKE FURTHER NOTICE that IPFS shall rely upon the Certification of Lisa Chandler and Exhibits attached thereto, Certification of Counsel, Memorandum of Law, and proposed Order submitted herewith.

PLEASE TAKE FURTHER NOTICE that in accordance with LBR 9013-2(a), opposition to the relief requested, and, or cross-motions, if any, shall be filed with the Clerk of the Bankruptcy Court and served upon all parties in interest at least seven (7) days before the hearing date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be decided on the papers in accordance with LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that in accordance with LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

NORRIS McLAUGHLIN, P.A.
Attorneys for Secured Creditor,
IPFS Corporation

By: /s/ Jerome F. Gallagher, Jr.
Jerome F. Gallagher, Jr.

Dated: July 29, 2022